## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY



## REGION III 1650 Arch Street Philadelphia, Pennsylvania 19103-2029

June 25, 2009

Ms. Susan Trail Monocacy National Battlefield 4801 Urbana Pike Frederick, Maryland 21704

RE: Draft General Management Plan/ Environmental Impact Statement Monocacy National Battlefield, Maryland (April 2009) CEQ #20090133

Dear Ms. Trail,

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1508), the United States Environmental Protection Agency (EPA) has reviewed the subject document.

The purpose of this plan is to be the basic guidance document that will define a direction for the management of Monocacy National Battlefield. When approved, the plan will represent an agreement by the National Park Service with the public on how the battlefield will be used and managed in the next 15-20 years. The area covered by this plan comprises 1,647 acres that encompass most of the lands upon which the Battle of Monocacy was fought during the Civil War.

Four alternatives are considered in this Draft General Management Plan/ Environmental Impact Statement (DEIS). The three action alternatives preserve and maintain all historic structures and the historic farmlands would continue to be leased to keep them agricultural. Alternative 4 is the preferred alternative. Under this alternative, national battlefield administration would be moved into the Thomas House and maintenance would continue to operate at its present location. Visitors would use their own vehicles to drive around the battlefield. This alternative also includes a landscaped commemorative area, an extension to the Gambrill Mill trail, new parking nearer to the Worthington House and exhibits and restrooms at the stone tenant house on the Thomas Farm. The possibility of a deck spanning I-270 is being evaluated in consultation with the Maryland Department of Transportation. This is being considered as a mitigating measure for potential impacts caused by the widening of I-270.

Based on our review, this DEIS is rated "LO" (Lack of Objections). A description of our rating system can be found at: <a href="http://www.epa.gov/compliance/nepa/comments/ratings.html">http://www.epa.gov/compliance/nepa/comments/ratings.html</a>.

During any construction activities, impacts to resources should be avoided and minimized. In addition, activities under this action should comply with all appropriate state and federal guidelines, regulations, and executive orders (including Invasive Species, Green Buildings, Low Impact Development, etc). Information regarding Low Impact Development can be found at <a href="http://www.epa.gov/nps/lid/">http://www.epa.gov/nps/lid/</a>. EPA would appreciate consideration of visitor shuttles, with use of low emission vehicles, to replace or reduce use of individual vehicles in touring the site. An air quality analysis may be warranted if there is significant roadway construction.

Thank you for the opportunity to offer these comments. If you have any questions, please contact Ms. Barbara Okorn at (215) 814-3330.

Sincerely,

Barbara Rudnick

NEPA Team Leader